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6 Attorneys for Plaintiff  
United States of America  
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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

CASE NO. 1:22-CR-00297-JLT-BAM

12 Plaintiff,

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER

13 v.  
14 CESAR LOSOYA-CASTREJON,  
ARTURO FARIAS-ZEPEDA,  
ROBERTO SORIA-CUEVAS,  
RICARDO RIVAS ARREDONDO,  
JOSE ADAN CHAIDEZ OJEDA,  
15  
16

DATE: 3/27/2024

TIME: 1:00 p.m.

COURT: Hon. Barbara A. McAuliffe

17 Defendants.  
18

19 **STIPULATION**

20 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
21 through defendant's counsel of record, hereby stipulate as follows:

22 1. By previous order, this matter was set for status conference on 3/27/2024.

23 2. By this stipulation, defendant now moves to continue the status conference until

24 6/26/2024, and to exclude time between 3/27/2024, and 6/26/2024, under 18 U.S.C. § 3161(h)(7)(A),  
25 B(iv) [Local Code T4].

26 3. The parties agree and stipulate, and request that the Court find the following:

27 a) The government has represented that the discovery associated with this case  
28 includes thousands of pages of investigative reports, video, audio recordings, cell phone

1 extractions, and other voluminous materials. Supplemental discovery has been either produced  
2 directly to counsel or made available for inspection and copying. The government has extended  
3 formal plea offers and is engaged in plea negotiations.

4 b) Counsel for defendants desire additional time to consult with their clients, review  
5 the voluminous discovery, conduct independent investigation, and pursue a potential pretrial  
6 resolution of the case.

7 c) Counsel for defendants believe that failure to grant the above-requested  
8 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
9 into account the exercise of due diligence.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the  
12 case as requested outweigh the interest of the public and the defendant in a trial within the  
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
15 et seq., within which trial must commence, the time period of 3/27/2024 to 6/26/2024, inclusive,  
16 is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it  
17 results from a continuance granted by the Court at defendant's request on the basis of the Court's  
18 finding that the ends of justice served by taking such action outweigh the best interest of the  
19 public and the defendant in a speedy trial.

20 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
21 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
22 must commence.

23  
24 IT IS SO STIPULATED.

25 Date: March 18, 2024

PHILLIP A. TALBERT  
United States Attorney

26  
27 /s/ Antonio J. Pataca  
ANTONIO J. PATACA  
28 Assistant United States Attorney

1 Date: March 18, 2024

/s/ Victor M. Perez

2 VICTOR M. PEREZ  
Counsel for Defendant  
3 CESAR LOSOYA-CASTREJON

4 Date: March 18, 2024

/s/ David Torres

5 DAVID TORRES  
Counsel for Defendant  
6 ARTURO FARIAS-ZEPEDA

7 Date: March 18, 2024

/s/ Victor Chavez

8 VICTOR CHAVEZ  
Counsel for Defendant  
9 ROBERTO SORIA-CUEVAS

10 Date: March 18, 2024

/s/ Mark King

11 MARK KING  
Counsel for Defendant  
12 RICARDO RIVAS-ARREDONDO

13 Date: March 18, 2024

/s/ Patrick Aguirre

14 PATRICK AGUIRRE  
Counsel for Defendant  
15 JOSE ADAN CHAIDEZ-OJEDA

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## ORDER

**IT IS SO ORDERED** that the status conference is continued from March 27, 2024, to **June 26, 2024, at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: March 19, 2024

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE